

**Mary S. Hobson**  
**Attorney & Counselor**  
999 Main, Suite 1103  
Boise, ID 83702  
208-385-8666

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September 17, 2013

**VIA HAND DELIVERY**

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington  
Boise, ID 83702-5983

**RE: Docket Nos. QWE-T-13-05**


Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of CenturyLink QC's **Reply Comments**.

Qwest Corporation dba CenturyLink QC, respectfully requests that the Commission enter an order consistent with the requested relief contained in its Petition filed July 31, 2013.

If you have any questions, please contact me. Thank you for your cooperation in this matter.

Very truly yours,

  
Mary S. Hobson

Enclosure

Mary S. Hobson (ISB. No. 2142)  
999 Main, Suite 1103  
Boise, ID 83702  
Tel: 208-385-8666  
[mary.hobson@CenturyLink.com](mailto:mary.hobson@CenturyLink.com)

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Lisa A. Anderl  
Associate General Counsel, CenturyLink  
1600 7th Avenue  
Seattle, WA 98191  
Tel: (206) 345-1574  
[Lisa.Anderl@CenturyLink.com](mailto:Lisa.Anderl@CenturyLink.com)

Attorneys for CenturyLink QC

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE PETITION OF  
QWEST CORPORATION DBA  
CENTURYLINK QC FOR APPROVAL TO  
REPLACE THE PERFORMANCE  
ASSURANCE PLAN BASED UPON  
SETTLEMENT AGREEMENT IN  
COLORADO**

**Case No. CTL-T-13-05**

**Reply Comments of  
CenturyLink QC**

Qwest Corporation dba CenturyLink QC (CenturyLink QC), by and through its undersigned attorneys, files these Reply Comments in support of its request to replace the company's current Performance Assurance Plan (PAP) with a revised PAP that reflects a settlement agreement between CenturyLink QC and various Competitive Local Exchange Carriers (CLECs) that participated in a PAP review before the Colorado Public Utilities Commission.

**Background**

CenturyLink QC filed its Petition requesting that the Commission approve the replacement of its existing PAP with the redesigned PAP on July 31, 2013. On August 14, 2013, the Commission issued its Notice of Petition and Notice of Modified

Procedure, Order No. 32877. The Order provided notice that Commission had determined that the matter would proceed under modified procedure pursuant to Rules 201 and 204 of the Commissions Rules of Procedure, and set a schedule for those wishing to file written comments in support or opposition to CenturyLink's Petition. Initial comments were to be filed within 30 days of the Commission's Order, i.e., on or before September 13, 2013. The Order further provided for a 14-day period in which reply comments could be submitted.

### **Staff Comments**

Only the Commission Staff filed comments within the initial comment period. Staff recommended that the redesigned PAP, which is based on the settlement agreement in Colorado, should be adopted.<sup>1</sup> Staff also conditionally supported CenturyLink QC's request that the Commission deem all existing interconnection agreements that contain the Idaho PAP modified to incorporate the revisions contained in the redesigned PAP effective January 1, 2014.<sup>2</sup> There modifications are requested to occur without need of further approvals or filings. Staff noted that those CLECs involved in the Colorado docket had agreed to these provisions and that all Idaho CLECs were notified and given the opportunity to comment. Staff therefore supported this provision, "absent any objections."<sup>3</sup> No other interested party filed an objection or otherwise responded to the opportunity to comment provided by Order No. 32877.

### **Conclusion**

Based upon the foregoing, CenturyLink QC respectfully asks that the Commission enter an order granting approval of the redesigned PAP and associated Performance Indicator Definitions<sup>4</sup> effective January 1, 2014. CenturyLink QC further requests that the Commission, without need for further filings or approvals, deem all existing interconnection agreements that currently contain the PAP modified to incorporate the redesigned PAP revisions, effective January 1, 2014. Finally the company asks that the Commission close Docket No. QWE-T-08-04.

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<sup>1</sup> Staff Comments at 4

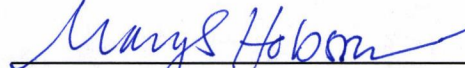
<sup>2</sup> Id. at 3-4

<sup>3</sup> Id. at 4

<sup>4</sup> See Attachments 1 and 2 to CenturyLink QC's Petition herein.

Submitted this 17<sup>th</sup> day of September, 2013.

Respectfully submitted,



Mary S. Hobson (ISB. No. 2142)  
999 Main. Suite 1103  
Boise, ID 83702

Lisa A. Anderl  
Associate General Counsel, CenturyLink  
1600 7th Avenue  
Seattle, WA 98191

Attorneys for CenturyLink

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 17<sup>th</sup> day of September 2013, served the foregoing Reply Comments of CenturyLink QC in Case No. QWE-T-13-05, by hand delivery to the following:

Weldon B. Stutzman  
Deputy Attorney General  
Idaho Public Utilities Commission  
472 W Washington Street  
Boise, Idaho

  
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Mary S. Hobson